



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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SSIC NO. 5090.3.A

25 April 2005

Mr. F. Andrew Piszkin
BRAC Environmental Coordinator
Base Realignment and Closure
7040 Trabuco Road
Irvine, California 92618

Subject: Draft Proposed Plan for Installation Restoration Program (IRP) Sites 8 and 12
Former Marine Corps Air Station, El Toro, California

Mr. Piszkin:

The U.S. Environmental Protection Agency has reviewed the subject draft proposed plan dated April 2005. This proposed plans covers the excavation and off-site disposal of waste and soils above cleanup goals at IRP Sites 8 and 12. We have but a few comments to offer on the document as presented.

If you should have any questions/concerns, please contact me at 415-972-3349.

Sincerely,

Rich Muza, RPM
Superfund Division

cc. Karnig Ohannessian, NFECSW SDIEGO
Content Arnold, NFECSW SDIEGO
Frank Cheng, DTSC
John Broderick, RWQCB
Bob Woodings, RAB
Marcia Rudolph, RAB

received
5/2/05

Comments on the Draft Proposed Plan for Installation Restoration Program (IRP) Sites 8 and 12

1. General – The document could use a thorough edit. For example, on page 2 the title of the map overlies a note regarding the glossary of technical terms. Also, this map has labels that are incomplete (ie., missing letters). It is recommended that a thorough edit of the document be completed prior to finalization and release for public comment.
2. Definitions of Chemical and Technical Terms – It is recommended that the terms in bold italics be defined at first occurrence by a footnote as being those that are presented in the glossary. After this footnote, there would be no need to repeat this citation within the text (see page 3 after the string of typical site contaminants for an example) or to provide a definition within the text (see page 4 after picocuries for an example).
3. Table 2 – For Site 8, Unit 5 additional data is provided in the table indicating a cancer and noncancer risk without providing any risk management considerations and/or recommended actions. It is recommended that this omission be corrected.
4. Summary of Site Cleanup Alternatives – Under “Alternative 1 – No Action”, the end of the paragraph provides information in parentheses regarding the no further action units of Sites 8 and 12. This information would be better placed in the introductory paragraph at the top of the page. It is recommended that this information be relocated to the introductory paragraph of this section.
5. Table 3 – Under the EPA criteria “reduction of toxicity, mobility, or volume through treatment”, in the evaluation of Alternatives 3, 4, and 5, mobility is not evaluated for any of these alternatives and toxicity is not evaluated for Alternative 5. It is recommended that these omissions be corrected.